1 GRANT P. FONDO (SBN 181530) GFondo@goodwinlaw.com 2 GOODWIN PROCTER LLP 601 Marshall Street 3 Redwood City, CA 94063 Tel.: +1 650 752 3100 4 Fax: +1 650 853 1038 5 AMANDA H. RUSSO (SBN 319617) ARusso@goodwinlaw.com 6 GOODWIN PROCTER LLP 601 S. Figueroa Street, 41st Floor 7 Los Angeles, CA 90017 Tel.: +1 213 426 2500 8 Fax: +1 213 623 1673 9 Attorneys for Respondent PAYWARD VENTURES, INC., d/b/a 10 KRAKEN OR KRAKEN.COM 11 12 UNITED STATES DISTRICT COURT 13 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 14 15 16 UNITED STATES OF AMERICA, Case No. 3:23-MC-80029-JCS Plaintiff, DECLARATION OF TODD SIEMERS 17 IN SUPPORT OF PAYWARD **VENTURES, INC.'S OPPOSITION TO** 18 v. PETITION TO ENFORCE INTERNAL PAYWARD VENTURES, INC., d/b/a **REVENUE SERVICE SUMMONS** 19 KRAKEN OR KRAKEN.COM, OR ITS 20 PREDECESSORS, SUBSIDIARIES, Date: May 19, 2023 9:30 a.m. DIVISIONS, OR AFFILIATES, Time: Courtroom: F (15th Floor) 21 Respondent. Judge: Hon. Joseph C. Spero 22 23 24 25 26 27 28 DECLARATION OF TODD SIEMERS IN SUPPORT OF

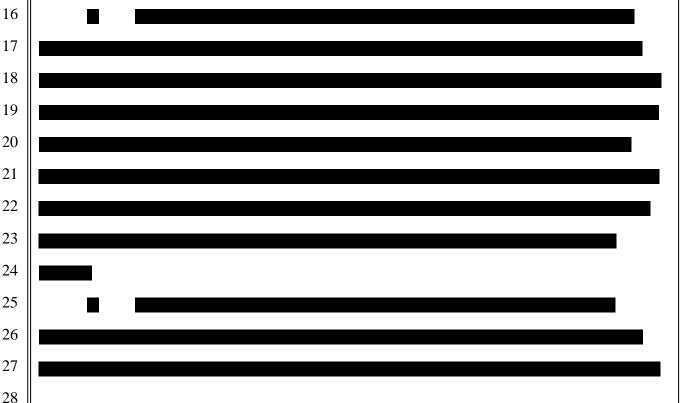
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OPPOSITION TO PETITION TO ENFORCE

DECLARATION OF TODD SIEMERS

I, Todd Siemers, do hereby declare and state as follows:

- 1. I am employed at Payward, Inc., which does business as Kraken ("Kraken") and is the parent company of Payward Ventures, Inc. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would competently testify to them.
- 2. I have been a Kraken employee for over four-and-a-half years. My current title is Staff Data Engineer, and I have worked in the Data Engineering Department during my entire tenure at Kraken.
- 3. In my role at Kraken, I have developed extensive knowledge regarding the information Kraken has in its records, including with respect to user personal information and transactional activity, how that information is stored and maintained at Kraken, as well as how that information can be searched, queried, and retrieved.
- 4. Kraken was founded in 2011 and is a United States-based online digital asset exchange platform available to the public. Kraken offers its services to both U.S. and international users in more than 190 countries.



DECLARATION OF TODD SIEMERS IN SUPPORT OF OPPOSITION TO PETITION TO ENFORCE

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